

January 18, 1995

Dr. Barbara Carr  
SPCC Coordinator  
USEPA, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60439

EPA Region 5 Records Ctr.



284278

**RE: Egan Marine Corporation, Lemont, Illinois**

Dear Dr. Carr:

Pursuant to the correspondences from your office dated October 28, 1994 and in accordance with the recent telephone correspondence held between you and the undersigned on this date, ENVIRONMENTAL MANAGEMENT AND RESOURCE CONSULTANTS, INC., is hereby submitting the enclosed response on behalf of our client, Mr. Dennis Egan, Egan Marine Corporation, Lemont, Illinois.

In order to bring the facility into compliance with the SPCC (Spill Prevention Control and Countermeasures ) regulations under 40 CFR Part 112, Egan Marine Company intends to implement the following actions:

1. cleanup of releases associated with the daily operations of all on-site aboveground storage tanks. EMC has and continues to implement the removal of stained soils in the vicinity of the aboveground storage tanks containing oil product. Removal of visually impacted materials will be completed within 90 days. All cleanup residues removed from the site will be managed in accordance with all applicable local, State and Federal regulations;
2. daily inspection procedures to ensure immediate response to discovered leaks or spillages associated with daily operation. EMC will develop official inspection logs and incorporate a copy of the inspection log sheet with the SPCC Plan to be submitted under Item #4 following;
3. training of on-site personnel involved with daily operations to ensure awareness of SPCC requirements. A training log record of on-site personnel will be incorporated into the SPCC Plan intended for submittal to USEPA as described under Item #4;
4. EMC is in the process of developing SPCC procedures for the plant. These procedures will be outline in a written SPCC Plan which will be submitted to USEPA on February 3, 1995;
5. EMC intends to evaluate the existing product inventory in relation to the required storage capacity necessary for operations. EMC intends to minimize and decommission any unnecessary storage tanks presently on-site. Those tanks intended for continued use will be relocated to an area constructed within a concrete secondary containment. EMC

intends to complete the described improvements within 180 days;

6. the on-site earthen berm construction will be evaluated and repaired and expanded as necessary to provide adequate secondary containment of the proposed tank inventory. Berm re-construction activities will be completed within 90 days;
7. within 90 days, all petroleum-based product storage tanks will be equipped with concrete secondary containment structures. Those tanks that contain petroleum fuel products pose a greater potential for environmental impairment in the event of a release than do the remaining (edible vegetable oil stock) product storage tanks.

EMC is committed to resolving the current environmental issues concerning the SPCC regulatory compliance of the facility. At such time all of the above improvements are completed, EMC will submit final certification of compliance with the above requirements and the SPCC Plan developed for the site. Should you have any further questions regarding the enclosed, feel free to contact the undersigned, or Mr. Dennis Egan of Egan Marine Corporation @ (708)739-6660.

Sincerely,



Jeanette Virgilio  
President

cc: Mr. Dennis Egan, EMC, P.O. Box 669, Lemont, Illinois 60439

**ENMARC**